

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
ROUBEN MADIKIAN, _____)	
)	
Plaintiff, _____)	
)	
v. _____)	CA No. 1:04-cv-12451-JLT
)	
AMERICAN AIRLINES ASSOCIATION)	
OF PROFESSIONAL FLIGHT)	
ATTENDANTS ("APFA"), et al., _____)	
)	
Defendants. _____)	
)	

CONSENTED MOTION TO EXTEND
TIME TO RESPOND TO COMPLAINT

Pursuant to an agreement with opposing counsel, defendants Association of Professional Flight Attendants ("APFA"), Amy Milenkovic, and Julia Carrigan ("Union defendants") move to extend the time to answer or otherwise plead to plaintiff's complaint. In support of their motion the Union defendants state as follows.

1. Defendant Milenkovic was served with the summons and complaint on February 16, 2005, and her answer would be due on March 8. On February 28, 2005, counsel for the Union defendants informed plaintiff's counsel that he would accept service on behalf of defendant APFA. APFA's answer would accordingly be due on March 21. (Defendant Carrigan has already responded to the original complaint by filing a motion to dismiss.)

2. Plaintiff's counsel has stated that he intends to file an amended complaint within the next few days. By telephone conversation of February 28, 2005, counsel for plaintiffs agreed that it would be unnecessary for defendants Milenkovic and APFA to answer the original complaint, and that they should instead answer or otherwise plead to the amended complaint within the time provided by Rule 15(a).

3. Accordingly, the Union defendants respectfully request that the time for defendants Milenkovic and APFA to respond to the complaint be adjusted as set forth in paragraph 2 above.

Respectfully submitted,

s/David B. Rome

DAVID B. ROME, BBO #426400
Pyle, Rome, Lichten, Ehrenberg
& Liss-Riordan, P.C.
18 Tremont Street, Suite 500
Boston, Massachusetts 02108
(617) 367-7200
(617) 367-4820 (fax)

JOHN M. WEST (*pro hac vice*)
Bredhoff & Kaiser, P.L.L.C.
805 Fifteenth Street, N.W.
Suite 1000
Washington, DC 20005
(202) 842-2600
(202) 842-1888 (fax)

Counsel for defendants Carrigan,
Milenkovic, and APFA

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Consented Motion to Extend Time to Respond to Complaint was served by first-class mail, postage prepaid, this 28th day of February, 2005, as follows:

David D. Nielson
15 Cottage Avenue, Suite 301
Quincy, MA 02169

Daniel J. Ciccariello
15 Cottage Avenue, Suite 301
Quincy, MA 02169

Michael A. Fitzhugh
Fitzhugh, Parker & Alvaro LLP
155 Federal Street
Suite 1700
Boston, MA 02110-1727

s/David B. Rome

David B. Rome